

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Roberta L. Both

(b) County of Residence of First Listed Plaintiff Montgomery  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Saffren & Weinberg, 815 Greenwood Ave., Ste. 22  
Jenkintown, PA 19046; (215) 576-0100

## DEFENDANTS

Holy Redeemer Health Systems a/k/a Holy Redeemer  
Health Systems, Inc., d/b/a Holy Redeemer HospitalCounty of Residence of First Listed Defendant Montgomery  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
29 U.S.C. 623 (Age Discrimination Employment Act)Brief description of cause:  
Age Discrimination during employment

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE  
11/17/21

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 9 LONEY STREET, ROCKLEDGE, PA 19046  
Address of Defendant: 1648 HUNTINGDON PIKE, MEADOWBROOK, PA 19046  
Place of Accident, Incident or Transaction: MONTGOMERY COUNTY, PA

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☐ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 4/17/21 \_\_\_\_\_ Must sign here \_\_\_\_\_ 60643  
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

CIVIL: (Place a ☒ in one category only)

A. Federal Question Cases:

- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | 1. Indemnity Contract, Marine Contract, and All Other Contracts |
| <input type="checkbox"/>            | 2. FELA   |
| <input type="checkbox"/>            | 3. Jones Act-Personal Injury                                    |
| <input type="checkbox"/>            | 4. Antitrust  |
| <input type="checkbox"/>            | 5. Patent   |
| <input type="checkbox"/>            | 6. Labor-Management Relations                                   |
| <input type="checkbox"/>            | 7. Civil Rights   |
| <input type="checkbox"/>            | 8. Habeas Corpus  |
| <input type="checkbox"/>            | 9. Securities Act(s) Cases                                      |
| <input type="checkbox"/>            | 10. Social Security Review Cases                                |
| <input checked="" type="checkbox"/> | 11. All other Federal Question Cases                            |

(Please specify): ADEA (AGE DISCRIMINATION)

B. Diversity Jurisdiction Cases:

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | 1. Insurance Contract and Other Contracts        |
| <input type="checkbox"/> | 2. Airplane Personal Injury                      |
| <input type="checkbox"/> | 3. Assault, Defamation                           |
| <input type="checkbox"/> | 4. Marine Personal Injury                        |
| <input type="checkbox"/> | 5. Motor Vehicle Personal Injury                 |
| <input type="checkbox"/> | 6. Other Personal Injury (Please specify): _____ |
| <input type="checkbox"/> | 7. Products Liability                            |
| <input type="checkbox"/> | 8. Products Liability - Asbestos                 |
| <input type="checkbox"/> | 9. All other Diversity Cases                     |

(Please specify): \_\_\_\_\_

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, MARC A. WEINBERG, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☒ Relief other than monetary damages is sought.

DATE: 4/17/21 \_\_\_\_\_ Sign here if applicable \_\_\_\_\_ 60643  
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

ROBERTA L. BOTH  
9 Loney Street  
Rockledge, PA 19046

vs.

HOLY REDEEMER HEALTH SYSTEMS  
a/k/a HOLY REDEEMER HEALTH  
SYSTEMS, INC. d/b/a  
HOLY REDEEMER HOSPITAL  
1648 Huntingdon Pike  
Meadowbrook, PA 19046  
and  
1602 Huntingdon Pike  
Jenkintown, PA 19046

---

:  
:  
:  
:  
:  
: CIVIL ACTION  
: JURY TRIAL DEMANDED  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**I. PRELIMINARY STATEMENT**

1. Plaintiff, Roberta Both (hereinafter “Plaintiff”) brings this action under the Age Discrimination Employment Act of 1967, 29 U.S.C. §623 *et seq.* (“ADEA”); the Pennsylvania Human Relations Act, 43 P.S. §954 *et seq.* and applicable Pennsylvania common law. Plaintiff seeks equitable relief, compensatory damages, costs and attorney fees from Defendants for Defendants’ discriminatory practices and other tortuous actions.

**III. THE PARTIES**

2. Plaintiff is an adult individual and citizen of the Commonwealth of Pennsylvania residing at the above-captioned address.

3. Upon information and belief, Defendant, Holy Redeemer Health Systems, a/k/a and/or d/b/a Holy Redeemer Health Systems, Inc., d/b/a Holy Redeemer Hospital is corporation or business, organized under the laws of the Commonwealth of Pennsylvania, with a principal place of business located in Montgomery County 1648 Huntingdon Pike, Meadowbrook, PA

19046 and 1602 Huntingdon Pike, Jenkintown, PA 19046.

4. At all times relevant hereto, Plaintiff was supervised by Sue Kowalski and Kelly Pressler.

5. At all times relevant hereto Defendant, by and through its employees, including but not limited to Sue Kowalski and Kelly Pressler, was responsible for the hiring and firing of employees, including Plaintiff, at Holy Redeemer Hospital.

## **II. JURISDICTION AND VENUE**

6. Jurisdiction over this action is conferred on this Court by 28 U.S.C. §1331 and 28 U.S.C. §1343.

7. Venue is proper in the Eastern District of Pennsylvania pursuant to 28 U.S.C. §1391.

8. At all times material hereto, Defendant employed more than fifty (50) employees.

9. At all times material hereto, Defendant was an “employer” as defined by the Age Discrimination Employment Act of 1967, 29 U.S.C. §623 *et seq.* (“ADEA”)

10. At all times material hereto, Defendant was an “employer” as defined by §§4 and 5 of the Pennsylvania Human Relations Act, 43 P.S. §954 *et seq.*

11. At all times material hereto, Defendant aided and abetted the interference, discrimination, hostile work environment and harassment that Plaintiff was subjected to during the course and scope of her employment.

12. Plaintiff has complied with all jurisdictional prerequisites and was issued a Notice of Right to Sue by the Equal Employment Opportunity Commission on August 31, 2021, (Attached hereto as Exhibit “A”).

**COUNT I**

**ROBERTA BOTH V. HOLY REDEEMER HEALTH SYSTEMS a/k/a and/or d/b/a  
HOLY REDEEMER HEALTH SYSTEMS, INC., d/b/a HOLY REDEEMER HOSPITAL  
VIOLATION OF AGE DISCRIMINATION EMPLOYMENT ACT OF 1767, 29 U.S.C.  
§623 et seq.**

11. At all times relevant hereto, Plaintiff was experienced, qualified and able to perform her job duties as a Front Desk Oncology Specialist.

12. At the time of her hiring, Plaintiff was fifty-seven (57) years old.

13. Plaintiff's similarly situated co-workers were in their twenties (20s) and thirties (30s).

14. On or about June 25, 2020, Plaintiff raised concerns with respect to her managers abilities, as well as concerns with other occurrences within the department, which Plaintiff felt were improper.

15. Shortly thereafter, on July 9, 2020, Plaintiff was given a "third and final" written notice with respect to her purported poor conduct.

16. Plaintiff never received any prior notices with respect to her conduct.

17. The conduct that Plaintiff was accused of by the Defendant was false.

18. In fact, upon information and belief, Defendant asked an employee and co-worker of Plaintiff to certify that the employee had witnessed the purported bad conduct of the Plaintiff, which the employee refused to do, as the employee did not witness any bad conduct on the part of the Plaintiff.

19. Following the "third and final" warning, Plaintiff was targeted by the Defendant and employees based upon her age.

20. On or about January 25, 2021, Plaintiff was terminated for pretextual reasons, related to her age. Plaintiff was fifty-eight (58) at the time of her termination.

21. Following her termination, Plaintiff's position was filled by a significantly younger female.

22. Plaintiff's termination was causally related to her age as she was subjected to a hostile work environment, harassment, retaliation and termination because of her age.

23. Defendant knew or should have known about the aforementioned harassment and hostile work environment to which Plaintiff was subjected during the course of her employment.

24. Defendant failed to take prompt, remedial action to eliminate the aforementioned harassment and hostile work environment to which Plaintiff was subjected during the course of her employment.

25. The discrimination, harassment, hostile work environment, retaliation and termination to which Defendant subjected Plaintiff was intentional, with malice and with reckless indifference.

26. Defendant's reasons for disciplining and/or terminating Plaintiff were pretextual to obscure Defendants' discriminatory animus and purpose.

27. During the course and scope of Plaintiff's employment, she was subjected to ongoing antagonism as a result of her age.

28. The conduct of Defendants' treatment of Plaintiff in her employment and termination violated The Age Discrimination in Employment Act of 1967, 29 U.S.C. 623 *et seq.*, as Plaintiff's termination from employment was based on her age of over forty (40) years old.

WHEREFORE, Plaintiff, Roberta Both, seeks a determination that Defendant, Holy Redeemer Health Systems, a/k/a and/or d/b/a Holy Redeemer Health Systems, Inc., d/b/a Holy Redeemer Hospital, violated the Age Discrimination Employment Act of 1967, 29 U.S.C. §623 *et seq.* and requests all damages and relief permitted under the Act, including but not limited to: back

pay and front pay; equitable relief; injunctive relief included but not limited to barring future discriminatory conduct; attorney's fees, expert fees, costs and expenses; punitive damages, and such further relief as this Court deems just and fair.

## **COUNT II**

### **ROBERTA BOTH V. HOLY REDEEMER HEALTH SYSTEMS a/k/a and/or d/b/a HOLY REDEEMER HEALTH SYSTEMS, INC., d/b/a HOLY REDEEMER HOSPITAL VIOLATION OF PENNSYLVANIA HUMAN RELATIONS ACT 33 PS 955, ET SEQ.**

29. Plaintiff hereby incorporates by reference all of the aforementioned paragraphs as if fully set forth at length herein.

30. Defendants discriminated against Plaintiff because age.

31. Defendants discriminated against Plaintiff in the terms, conditions and privileges of her employment as Defendants allowed, fostered and subjected Plaintiff to harassment, hostile work environment and retaliation on the premises of Holy Redeemer Hospital, as set forth above.

32. At all times material hereto, the aforementioned harassment was unwelcome.

33. At all times material hereto, the aforementioned harassment was severe and pervasive.

34. At all times material hereto, the aforementioned harassment unreasonably altered the condition of Plaintiff's employment and created a hostile work environment.

35. Plaintiff's termination was causally related to age.

36. Defendant knew or should have known about the aforementioned harassment and hostile work environment to which Plaintiff was subjected during the course of her employment.

37. Plaintiff's age was used by Defendants as a negative factor in Defendants' decision to terminate Plaintiff.

38. Defendant's reasons for disciplining and/or terminating Plaintiff were pretextual to obscure Defendant's discriminatory animus and purpose.



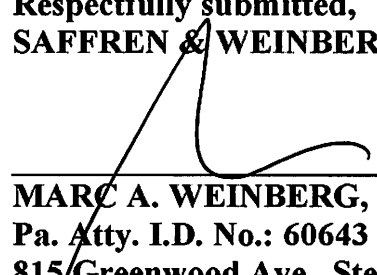
39. During the course and scope of Plaintiff's employment, she was subjected to ongoing antagonism as a result of her age.

40. The conduct of Defendants' treatment of Plaintiff in her employment, termination and retaliation violated the Pennsylvania Human Relations Act, 43 P.S. §954, *et seq.*, as Plaintiff's harassment, hostile work environment, retaliation and discharge from employment was based upon her age.

WHEREFORE, Plaintiff, Roberta Both, seeks a determination that Defendant, Holy Redeemer Health Systems, a/k/a and/or d/b/a Holy Redeemer Health Systems, Inc., d/b/a Holy Redeemer Hospital, violated the Pennsylvania Human Relations Act, 43 P.S. §954, *et seq.*, and requests all damages and relief permitted under the Pennsylvania Human Relations Act, 43 P.S. §954, *et seq.*, including but not limited to: back pay and front pay; equitable relief; injunctive relief included but not limited to barring future discriminatory conduct; attorney's fees, expert fees, costs and expenses; punitive damages, and such further relief as this Court deems just and fair.

Respectfully submitted,  
SAFFREN & WEINBERG

BY:

  
\_\_\_\_\_  
MARC A. WEINBERG, ESQUIRE  
Pa. Atty. I.D. No.: 60643  
815 Greenwood Ave., Ste. 22  
Jenkintown, PA 19046  
P: (215) 576-0100  
[mweinberg@saffwein.com](mailto:mweinberg@saffwein.com)

Dated: 11/17/21



# EXHIBIT A

EEOC Form 161 (11/2020)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Roberta L. Both**  
**9 Loney Street**  
**Rockledge, PA 19046**

From: **Philadelphia District Office**  
**801 Market Street**  
**Suite 1000**  
**Philadelphia, PA 19107**

☐

On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

**530-2021-04432**

**Legal Unit,**  
**Legal Technician**

**(267) 589-9707****THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**
☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

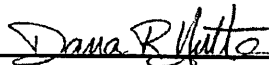
**- NOTICE OF SUIT RIGHTS -**

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



**Dana R. Hutter,**  
**Deputy Director**

**8/31/2021**

(Date Issued)

Enclosures(s)

cc: **Joesph Cassidy**  
**Vice President/ Human Resources**  
**HOLY REDEEMER HOSPITAL**  
**1648 Huntingdon Pike**  
**Meadowbrook, PA 19046**

**Robert P. Maizel, Esq.**  
**SAFFREN & WEINBERG**  
**815 Greenwood Ave**  
**Suite 22**  
**Jenkintown, PA 19046**